

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S MOTION OPPOSING PLAINTIFF’S CROSS-  
MOTION TO AMEND HER PLEADING AND DEEM HER SECOND  
AMENDED COMPLAINT FILED, *NUNC PRO TUNC***

COMES NOW Latasha Kebe (hereinafter referred to as “Ms. Kebe”), by and through undersigned Counsel, and based on all the facts and supporting legal argument presented in Defendant Kebe’s Motion to Dismiss With Prejudice Kebe Studios LLC as an Impermissibly Added Co-Defendant (Dkt. No. 80), respectfully moves that this Honorable Court deny Plaintiff’s Cross-Motion to Amend Her Pleading and Deem Her Second Amended Complaint Filed, *Nunc Pro Tunc*.

Plaintiff’s addition of Kebe Studios LLC as a new co-defendant, at the close of discovery and past the deadline for amendments, is impermissible; will unduly delay the proceedings; will unduly prejudice Ms. Kebe, who is prepared to proceed with dispositive motions and trial; and constitutes an exercise in futility.

WHEREFORE, Ms. Kebe respectfully requests that this Honorable Court:

- (i) deny Plaintiff's Cross-Motion to Amend Her Pleading and Deem Her Second Amended Complaint Filed, *Nunc Pro Tunc*, and
- (ii) enter an Order dismissing with prejudice Kebe Studios LLC as an impermissibly added co-defendant because the law, and justice, so require.

**CERTIFICATION AS TO FONT**

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 29th day of January, 2021.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2021, I electronically filed the foregoing DEFENDANT KEBE'S MOTION OPPOSING PLAINTIFF'S CROSS-MOTION TO AMEND HER PLEADING AND DEEM HER SECOND AMENDED COMPLAINT FILED, *NUNC PRO TUNC* with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

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